

Differences Among Tier II, TRI, and 112(r) Reporting Elements

For more information, contact the TCEQ's Small Business Assistance program at 1-800-447-2827.

Question	Tier II	Toxics Release Inventory (TRI)	Section 112(r)
Who administers this program?	Texas Department of Health (TDH) 800/452-2791, 512/834-6603	Texas Commission on Environmental Quality (TCEQ) 512/239-3100 And U.S. Environmental Protection Agency (EPA) 800/535-0202	EPA 214/665-2299 or 2292
What is a general description of the program?	Emergency Planning (the EP in EPCRA): reporting significant quantities of hazardous chemicals maintained at fixed facilities for emergency planning purposes	Community Right-to-Know (the CRA in EPCRA): reporting on air emissions, waste disposal, and wastewater discharges.	Risk Management for Accident Prevention: responding to emergencies and planning to prevent accidents
Which companies might need to submit this paperwork (if the company exceeds the threshold limits)?	Any company using chemicals that could present a physical or health hazard.	Companies with 10 employees or more; Standard Industrial Classification (SIC) codes 20-39 (manufacturing) plus 7 industry groups including solvent recovery services, commercial hazardous waste treatment, chemical distributors, metal mining, coal mining, petroleum bulk stations (wholesale), and electric utilities.	Business such as: farm cooperatives, chemical manufacturers, chemical distributors, metal product manufacturers, food processors, drinking water systems, and utilities
What paperwork might the company need to fill out?	<ul style="list-style-type: none"> an emergency planning letter, a Texas Tier II cover sheet, a Texas Tier II chemical description sheet, a paperwork reduction sheet 	Form R: an inventory of on-site releases and off-site waste transfers of substances (not products) listed under TRI	Risk Management Plan (submit on diskette; diskette available from EPA) <ul style="list-style-type: none"> hazard assessment prevention program

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			<ul style="list-style-type: none"> emergency response program
When is the paperwork due?	March 1st of every year for the previous calendar year	July 1st of every year for the previous calendar year	June 20, 1999, initially; update every 5 years
Is there a list of reportable chemicals with thresholds?	Yes; however, there are hazardous chemicals that are not on the threshold list, which the company may need to report.	Yes	Yes
How many reportable chemicals are on this threshold list?	There are 356 chemicals on the Extremely Hazardous Substances list; however, 650,000 reportable hazardous substances are not on the list	There are 650 toxic chemicals and chemical categories.	There are 77 acutely toxic substances and 63 flammable gases and volatile liquids.
What are the thresholds?	<p>Each limit represents the peak storage quantity of that chemical over a year.</p> <ul style="list-style-type: none"> 10,000 lbs. for 650,000 hazardous substances; 500 lbs. or the Threshold Planning Quantity (TQP), whichever is less, for 356 chemicals listed on the Extremely Hazardous Substances list 	If the company manufactures or processes more than 25,000 lbs. cumulative total in a year of any one TRI chemical, or otherwise uses (such as cleaning machine parts) more than 10,000 lbs. of any TRI chemical, then the company must report any on-site releases or off-site waste transfers of those chemicals (no minimum for releases or transfers).	Each chemical has a different threshold quantity. If the peak storage quantity of any chemical exceeds the limit on the 112(r) list at any point in the year, the company must report to EPA.